



May Newsletter

Training / Consulting Assistance

Available Training

We strongly believe in the importance of active learning with feedback from trainers and input from participants. Below are courses planned now and into this fall. **We expect our fall courses and schedules to fill** due to delayed training commitments. Plan ahead and sign up now for training dates or future consulting on-site visits. **If you are concerned about unknowns, talk to us about a flexible cancellation or date-change policy.** Email info@haccpcg.com for more information.

USDA Labeling Workshop

May 13-14, Virtual Event

Advanced HACCP

June 24-25, Ontario, CA

FSPCA Preventive Controls for Human Foods-PCQI

June 15-17, Detroit, MI

FSPCA Foreign Supplier Verification Programs (FSVP)

June 18-19, Detroit, MI

Basic HACCP

July 20-21, Philadelphia, PA

July 22-23, North Manchester, IN- Bi-Lingual

July 29-30, Ontario, CA

August 26-27, Los Angeles, CA

September 23-24, Orange County, CA

October 20-21, Cleveland, OH

October 28-29, San Diego, CA

FSPCA Preventive Controls *Plus* HACCP

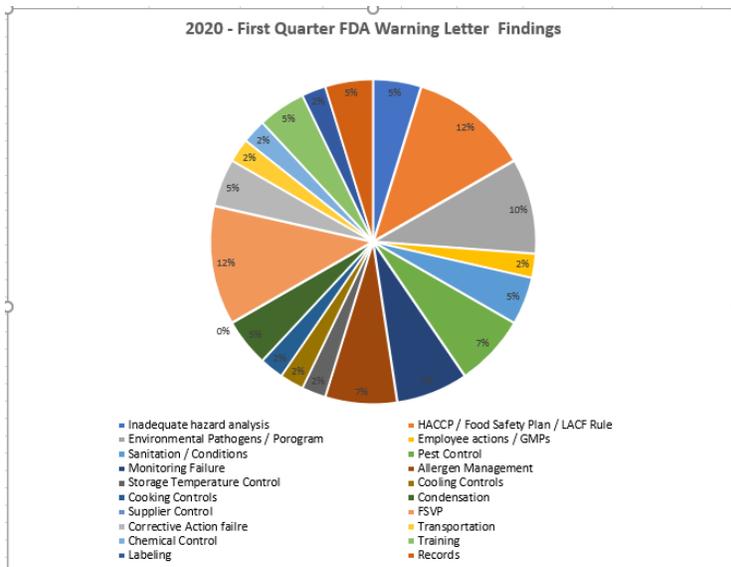
July 29-31, Dayton, OH

Implementing SQF Systems

July 22-23, Philadelphia, PA

October 22-23, Cleveland, OH

Register Now!



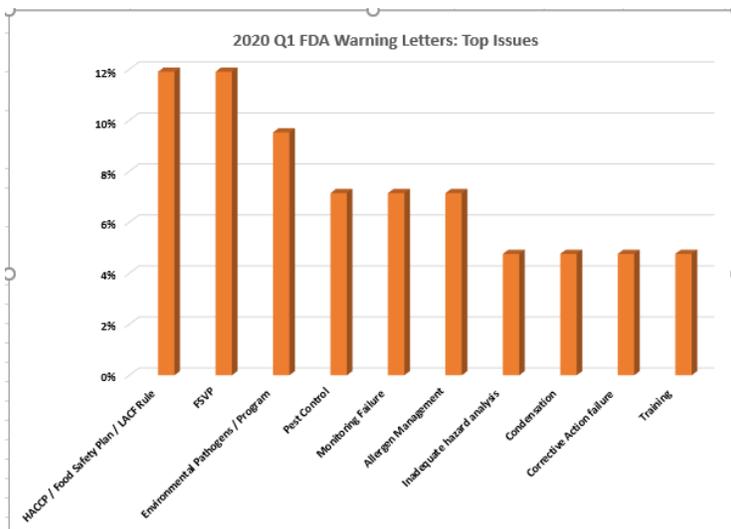
FDA Warning Letter Analysis

HCG conducted an analysis of FDA Warning Letters issued to food companies in the First Quarter (Q1) of 2020. We identified key issues in each letter and categorized them across 20 topics. There were 18 letters reviewed. From those, we categorized 42 issues or violations documented by the FDA. While this is a small set of data, some observations are noteworthy.

12% of the Q1 issues are regarding the design of documented plans including

HACCP / Food Safety Plan and Low Acid Canned Food Rule requirements. 10% were for lack of, or incomplete, Foreign Supplier Verification Plans. This reminds us of the importance of these items. Documenting key plans requires significant time and effort. Despite good efforts, lack of regulatory and food safety knowledge can lead to unintended violations.

Companies lacking the resources to complete these tasks on their own should seek assistance to avoid regulatory consequences. Avoidance of a Warning Letter is one benefit of having appropriate plans. Another, more important benefit, is the resulting risk-based approach to food safety that should be the outcome of the documentation process. Risk-based plans help companies focus often limited resources in the right areas. This improves performance while the documented plans increase trust between companies, regulators and customers.



We also noted that among the top reasons for Warning Letters, environmental pathogen evidence or environmental program design and implementation continues to be a challenge.

Companies producing Ready-to-Eat Products must evaluate the seriousness of this risk in their hazard analysis and should actively pursue an understanding of their unique processing environment. Failure to do so can ultimately result in harm to the public.

HCG will continue to monitor Warning Letters and provide future updates.



Social Distancing While Training

We miss our face-to-face training events! You do not have to settle for 'canned', impersonal, online or 'virtual' training. Your employees can still benefit from interactive training and need not travel if we come to you. HCG Members are located across the U.S. If we can safely travel to your location, we are happy to do so and we will work with you to maintain appropriate distancing combined with sanitation and use of PPE.

This picture is from a HACCP course held in April. You can see each participant had a safe space and distances were respected. 'Group' exercises were adjusted to ensure a practical learning event without violating social distancing.

Don't let COVID fears paralyze progress. Contact us if you'd like to plan a small event.

Do you need an SQF Audit Extension?



The pandemic has caused disruption in auditing schedules for many organizations. To assist, SQFI has processed over 600 SQF Certificate extensions allowing continued certification status for "up to 6 months" beyond the date on a certificate. Your Certifying Body (CB), should work with you to clarify what is acceptable or feasible based on your specific circumstances. HCG recommends you not delay this audit unless necessary. The number of delayed audits will likely cause scheduling difficulties later in the year. If your crisis management, social distancing policies and sanitation / disinfecting programs are effectively in place, you can work with your CB to demonstrate an effective on-going food safety system. Please remember, while some audits may be delayed, SQF annual registration is still required.

For more information, [see the SQFI website.](#)

Best Wishes - Stay Healthy and Helpful -



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STAY CONNECTED

